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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
[RIVERSIDE DIVISION]**

DENNIS KEITH OLSEN,

Debtor / Movant,

vs.

SCOTT A. CONWELL, ESQ., an
individual, AND CONWELL LAW LLC, a
Maryland Limited Liability Company,

Respondents.

CASE NO.: 6:14-bk-23600-MJ

Honorable Meredith A. Jury

Chapter 7

**REQUEST TO EXTEND TIME TO FILE MOTION FOR
ISSUANCE OF ORDER TO SHOW CAUSE WHY SCOTT A.
CONWELL, ESQ. and CONWELL LAW, LLC, a Maryland
Limited Liability Company, SHOULD NOT BE HELD IN
CONTEMPT OF COURT FOR VIOLATION OF THIS
COURT'S SEPTEMBER 12, 2016 "ORDER FINDING
SCOTT A. CONWELL, ESQ. IN CONTEMPT FOR
VIOLATION OF THE DISCHARGE INJUNCTION AND
GRANTING DEBTOR'S MOTION FOR SANCTIONS"
[DOCKET #48]; DECLARATIONS OF DEBTOR, JASON B.
CRUZ, ESQ. and JEFFREY P. NESSON, ESQ. IN SUPPORT
THEREOF**

**TO THE HONORABLE MEREDITH A. JURY, UNITED STATES BANKRUPTCY JUDGE, SCOTT
A. CONWELL, ESQ. an individual, and CONWELL LAW LLC, a Maryland Limited Liability
Company, THE UNITED STATES TRUSTEE, AND ALL OTHER PARTIES IN INTEREST:**

Debtor/Movant, Dennis Keith Olsen, by and through his attorneys of record, both in California
and Maryland, hereby requests an extension of time to file his MOTION FOR ISSUANCE OF ORDER TO
SHOW CAUSE WHY SCOTT A. CONWELL, ESQ. and CONWELL LAW, LLC, a Maryland Limited Liability
Company, SHOULD NOT BE HELD IN CONTEMPT OF COURT FOR VIOLATION OF THIS COURT'S
SEPTEMBER 12, 2016 "ORDER FINDING SCOTT A. CONWELL, ESQ. IN CONTEMPT FOR VIOLATION

1 OF THE DISCHARGE INJUNCTION AND GRANTING DEBTOR'S MOTION FOR SANCTIONS" [DOCKET
2 #48]; DECLARATIONS OF DEBTOR, JASON B. CRUZ, ESQ. and JEFFREY P. NESSON, ESQ. IN SUPPORT
3 THEREOF, and, as ground therefore, represents:

4 1. The ORDER GRANTING MOTION TO REOPEN CASE TO FILE MOTION FOR
5 CONTEMPT AND SANCTIONS AGAINST SCOTT A. CONWELL, ESQ. and CONWELL LAW, LLC, a
6 Maryland Limited Liability Company, FOR VIOLATION OF THIS COURT'S SEPTEMBER 12, 2016
7 "ORDER FINDING SCOTT A. CONWELL, ESQ. IN CONTEMPT FOR VIOLATION OF THE DISCHARGE
8 INJUNCTION AND GRANTING DEBTOR'S MOTION FOR SANCTIONS" [DOCKET #48] ("Order") was
9 entered March 6, 2018.

10 2. The Order requires Movant to file his Motion for Issuance of Order to Show Cause re
11 Contempt by April 5, 2018.

12 3. The deadline falls during Passover which began on Friday, March 30th and ends
13 Saturday, April 7th. Both Movant's Maryland attorney and the undersigned's paralegal are observant
14 Jews and 'out-of-pocket' until the end of the holiday.

15 4. Additional time is required to assemble and finalize the Motion and Affidavits.

16 5. The relief requested in this Request will not prejudice any party in interest.

17 WHEREFORE, Movant respectfully requests this Court extend the deadline to file the Motion
18 for Issuance of Order to Show Cause re Contempt to **April 13, 2018** and grant such other and further
19 relief as this Court deems just and proper.

20 Dated: April 4, 2018

The Law Office of Jason B. Cruz

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22
23 /s/ Jason B. Cruz

Jason B. Cruz

Counsel for Debtor/Movant Dennis Keith Olsen

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
18 E. State Street, Suite 203-1, Redlands, CA 92373

A true and correct copy of the foregoing document entitled: **MOVANT'S REQUEST TO EXTEND TIME TO FILE MOTION FOR ISSUANCE OF ORDER TO SHOW CAUSE WHY SCOTT A. CONWELL, ESQ. and CONWELL LAW, LLC, a Maryland Limited Liability Company, SHOULD NOT BE HELD IN CONTEMPT OF COURT FOR VIOLATION OF THIS COURT'S SEPTEMBER 12, 2016 "ORDER FINDING SCOTT A. CONWELL, ESQ. IN CONTEMPT FOR VIOLATION OF THE DISCHARGE INJUNCTION AND GRANTING DEBTOR'S MOTION FOR SANCTIONS" [DOCKET #48]; DECLARATIONS OF DEBTOR, JASON B. CRUZ, ESQ. and JEFFREY P. NESSON, ESQ. IN SUPPORT THEREOF** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On April 4, 2018, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Jason B Cruz jcruz@jcruzlaw.com
Scott A Conwell scott@conwellusa.com
Marian Garza ecfnofices@ascensioncapitalgroup.com
Marisol A Nagata & Darlene C Vigil cdcaecf@bdfgroup.com
Karl T Anderson (TR) edansie@hotmail.com, kanderson@ecf.epiqsystems.com
United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On April 4, 2018, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Hon. Meredith A. Jury, 3420 Twelfth Street, Suite 325, Riverside, CA 92501-3819

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on April 4, 2018, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 4, 2018
Date

Jason B. Cruz, Esq.
Printed Name

/s/ Jason B. Cruz
Signature